

There are different cross sections, e.g., that of the complete spring, having a center axis (whether straight or curved) and cross sections of each winding. It is believed that the claim is clear that the cross section refers to that of the winding. Reconsideration is respectfully requested.

Claim 11 was rejected under 35 U.S.C. §102(b) as allegedly anticipated by MacLeod. Claim 13 was rejected as allegedly obvious over the same reference. Applicant respectfully traverses each rejection.

MacLeod is silent as to using rotary and closed tools could be used for pipe cleaning if used in a straight or slightly bent form, and from his publication date in 1961 it is not believed that any of the many firms in the field of pipe cleaning has used such a tool for pipe cleaning. MacLeod teaches directly away from pipe cleaning, primarily because even if the loop of the spring as shown in Fig. 2 were opened and removed from the drive means shown in Fig. 15, there would still not be a "rotation axis" and hence no rotational movement, because there is no drive means for rotation. Furthermore MacLeod's loop, even if opened, would be much too short for cleaning pipes.

The application refers to driving machines (page 1, para. 2; page 4, lines 11 to 15). However the rotation may also be carried out in manually operated appliances, driven by a lever and handle.

According to MacLeod a closed or endless belt is always made. For example, fig. 15 is similar to a chain-saw as it is used by forest-workers for cutting trees.

The MacLeod device is not capable of performing the intended use. Presumably the Examiner asserts that MacLeod's coil as shown in Figure 5 would act as a cleaning spring, if used under rotation for such a purpose. However MacLeod is absolutely silent in this respect. MacLeod desires to close such a helix to a ring by a coupling as shown in Figures 1 and 2, and it would be absolutely impossible to use such a closed ring for pipe cleaning. The mention of saws, files, rasps or the like in Col. 1, lines 57/58, and Col. 3, lines 25 to 27 does not overcome

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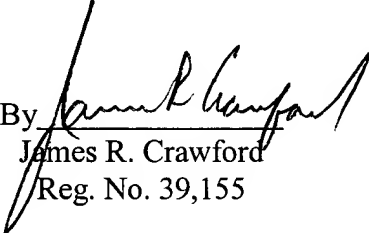
the restriction to closed rings. Figures 15 and 16 show such an application. Insertion into a lengthy pipe is impossible.

In view of the foregoing, each of the rejections is believed to be improper. Allowance is respectfully requested.

Any additional fees may be charged to deposit account no. 50-0624.

Respectfully submitted

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